

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>ePLUS Inc.,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil Action No. 3:09-CV-620 (REP)</b>
	)	
<b>v.</b>	)	
	)	
<b>LAWSON SOFTWARE, INC.,</b>	)	
	)	
	)	
<b>Defendant.</b>	)	

**SUPPLEMENTAL DECLARATION OF DAVID M. YOUNG, ESQ., IN SUPPORT OF  
PLAINTIFF EPLUS INC.'s RESPONSIVE CLAIM CONSTRUCTION BRIEF**

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I, David M. Young, declare as follows:

1. I am an attorney at Goodwin Procter LLP, counsel for Plaintiff ePlus Inc. in this action. I submit this declaration in support of Plaintiff ePlus Inc.'s Responsive Claim Construction Brief.

2. I have personal knowledge of the facts stated herein and, if called as a witness, could and would testify competently hereto.

3. Attached hereto as Exhibit 20 is a true and accurate copy of a definition for the term "e-sourcing" from the PC Magazine Encyclopedia available at [www.pcmag.com/encyclopedia\\_term/0,2542,t=e-sourcing&i=42263,00.asp](http://www.pcmag.com/encyclopedia_term/0,2542,t=e-sourcing&i=42263,00.asp).

4. Attached hereto as Exhibit 21 is a true and accurate copy of a definition for the term "e-sourcing" from ZDNet available at [www.dictionary.zdnet.com/definition/e-sourcing.html](http://www.dictionary.zdnet.com/definition/e-sourcing.html).

5. Attached hereto as Exhibit 22 is a true and accurate copy of the Response to the Office Action dated December 8, 1997 in connection with U.S. Patent Application Serial No. 08/288,577 (which issued as the '683 Patent) received in the U.S. Patent and Trademark Office on April 14, 1998.

I declare under penalty of perjury that the foregoing is true and correct. Executed at Washington, D.C., this 19th day of January, 2010.

/s/ David M. Young  
David M. Young

**CERTIFICATE OF SERVICE**

I hereby certify that on the 19th of January, 2010, the foregoing Supplemental Declaration of David M. Young, Esq. in Support of Plaintiff ePlus Inc.'s Responsive Claim Construction Brief was electronically filed with the Clerk of the Court using the CM/EFC system, which will then send a notification of such filing (NEF) to the following. Copies of the foregoing were also transmitted *via electronic mail* to the following:

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